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KAYE SCHOLER LLP

The McPherson Building
901 Fifteenth Street, NW
Washington, DC 20005
202 682-3500
Fax 202 682-3580
www.kayescholer.com

Bruce A. Eisen, Esq.
202 682-3538
Fax 202 682-3580

September 30, 2002

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Docket No. MB 02-235
Ex Parte Presentations, DA 02-2082

Dear Ms. Dortch:

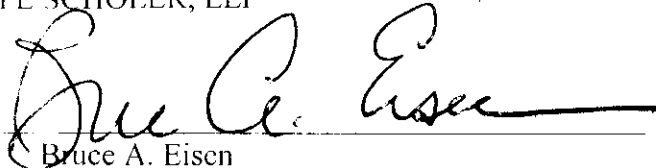
On behalf of Spanish Broadcasting System, Inc. ("SBS"), there is transmitted herewith an original and one copy of a memorandum summarizing oral ex parte presentations made to the Commission and its staff on September 18 and 19, 2002, pursuant to the Commission's Public Notice in the above-referenced docket, released August 26, 2002. This memorandum supplements the September 20, 2002 letter from undersigned counsel which, inter alia, noted SBS's intention to file a request for confidentiality with regard to certain documents that were used in conjunction with the oral ex parte presentation. Those documents have now been filed without a request for confidentiality.

Should any questions arise with regard to this matter, kindly communicate directly with this office.

Very truly yours,

KAYE SCHOLER, LLP

By:


Bruce A. Eisen

Enclosure

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List ABCDE

cc Qualex International/Rm CY-B402
 Alex Johns, Legal Assistant to Commissioner Copps
 W. Kenneth Ferree, Chief, Media Bureau
 Robert Ratcliffe, Deputy Chief, Media Bureau
 Barbara Kreisman Chief, Video Division
 Clay Pendarvis, Associate Chief, Video Division
 Mary Fitzgerald, Assistant Chief, Video Division
 David Brown, Senior Legal Advisor, Office of Broadcast License Policy
 Commissioner Kevin Martin
 Catherine Crutcher Bohigian, Legal Advisor on Media Issues to
 Commissioner Martin
 Susan Eid, Legal Assistant to Chairman Powell

EX PARTE MEMORANDUM (Docket No. MB 02-235)

On September 20, 2002, Spanish Broadcasting System, Inc. ("SBS"), filed a letter with the Commission reflecting certain ex parte presentations made to the Commission and its staff pursuant to the Commission's Public Notice in the above-referenced docket, released August 26, 2002. The actual presentations were made during the week of September 16, 2002. The following represents a list of those persons to whom the presentations were made:

Alex Johns, Legal Assistant to Commissioner Copps
W. Kenneth Ferree, Chief, Media Bureau
Robert Ratcliffe, Deputy Chief, Media Bureau
Barbara Kreisman Chief, Video Division
Clay Pendarvis, Associate Chief, Video Division
Mary Fitzgerald, Assistant Chief, Video Division
David Brown, Senior Legal Advisor, Office of Broadcast License Policy
Commissioner Kevin Martin
Catherine Crutcher Bohigian, Legal Advisor on Media Issues to
Commissioner Martin
Susan Eid, Legal Assistant to Chairman Powell

The presentations addressed the way in which Clear Channel Communications, Inc. ("CCC") had misrepresented facts to the Commission and conspired to control United States Hispanic radio in violation of the Commission's ownership limits and the anti-trust laws. Raul Alarcon, Jr., President and Chief Executive Officer of SBS made the presentations. SBS showed that the proposed transfer of control, which would result in the merger of Hispanic Broadcasting Corporation ("HBC") and Univision Communications, Inc. ("Univision"), would not comply with the public interest. The presentations addressed CCC's meaningful business relationship with HBC which has produced illegal and anti-competitive actions and which has impaired SBS's and other's ability to effectively compete in the market place. In addition to the parties' anti-competitive behavior, HBC and CCC have also attempted to circumvent the Commission's ownership limits through CCC's ownership interest in HBC.

The wrongful activity also extends to Univision and Entravision Communications Corporation, which is affiliated with Univision and in which Univision maintains what should be considered to be an attributable ownership interest. Thus, the Commission has been presented with another transaction fraught with the same willful violations of which CCC and HBC are

guilty. The parties' interests in radio stations, television stations, outdoor billboards and entertainment venues have led to conduct that directly conflicts with the public interest. CCC, HBC, Univision and Entravision have attempted to control Hispanic media in this country in disregard of anti-trust policy and Commission rules.

The public interest deserves better protection from government regulators because the relationship among the parties to the merger are not what they appear to be on the surface. Commission approval of the transaction will result in the elimination of competitive voices in the market place and the reduction of minority ownership of media.